

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROMAN V. SELEZNEV,
Defendant,

NO. CR11-0070RAJ

**GOVERNMENT'S PROPOSED
VOIR DIRE**

Trial Date: August 15, 2016

The United States submits the following proposed voir dire questions in the above-captioned matter.

1. Have any of you heard of this case or the defendant, Roman Seleznev, before today?
2. Do any of you personally know any of the attorneys, the defendant, or witnesses in this case? (Court or counsel to read witness lists.)
3. Have any of you ever been a juror in a civil or criminal case?
 - a. If so, was the jury able to reach a verdict?
4. Have any of you ever served on a grand jury?
5. Have any of you been involved in any lawsuit involving the federal government?

1 6. Have any of your relatives been involved in any lawsuit involving the
2 federal government?

3 7. Have any of your close friends been involved in any lawsuit involving the
4 federal government?

5 8. Have any of you ever been charged with, or investigated for, a criminal
6 offense?

7 9. Have any of your relatives ever been charged with, or investigated for, a
8 criminal offense?

9 10. Have any of your close friends, ever been charged with, or investigated for,
10 a criminal offense?

11 11. Have you ever had a particularly positive experience with any law
12 enforcement personnel, either local, state, or federal?

13 12. Have you ever had a particularly negative experience with any law
14 enforcement personnel, either local, state, or federal?

15 13. Have any of you ever been a witness in a criminal case?

16 14. Other than for minor traffic offenses and dissolutions, have any of you had
17 to appear in court for any reason?

18 15. Are any of you employed in law enforcement?

19 16. Are any of your relatives employed in law enforcement?

20 17. Are any of your close friends employed in law enforcement?

21 18. Are any of you a criminal defense lawyer or employed by a criminal
22 defense lawyer or law firm?

23 19. Are any of your relatives a criminal defense lawyer or employed by a
24 criminal defense lawyer or law firm?

25 20. Are any of your close friends a criminal defense lawyer or employed by a
26 criminal defense lawyer or law firm?

27 21. Are any of you employed by a court?

22. Are any of your relatives employed by a court?

23. Are any of your close friends employed by a court?

24. Do any of you have any family emergencies needing your immediate attention that would cause you to not be able to concentrate on the proceedings in court?

25. Do any of you need special accommodation to allow you to concentrate on the proceedings in court for an extended period of time?

26. Have any of you had a negative experience with, or do you hold strong opinions about, the United States government that would prevent you from being fair and impartial in this case?

27. Have any of you had a particularly positive experience with the United States Secret Service?

28. Have any of you had a negative experience with, or do you hold strong opinions about, the United States Secret Service, that would prevent you from being fair and impartial in this case?

29. Have you, a relative, or a close friend, ever worked for the United States Secret Service?

30. Do any of you, or your family members or close friends, work in the restaurant industry?

31. Do any of you have particular familiarity with credit card companies?

32. Do any of you have particular familiarity with banks?

33. Do any of you have particular familiarity with computer programming, computer forensics or computer hacking?

34. Do any of you have particularly strong feelings, either positive or negative, about computer hacking?

35. Do any of you have particular familiarity with network or internet security?

36. Have any of you been the victim of identity theft?

37. Have any of you been the victim of credit card fraud?

1 38. Have any of you had a computer infected with malware or a computer
2 virus?

3 39. Have any of you had one of your personal or work computers accessed by
4 someone outside of your family or workplace without your permission?

5 40. Are any of you or your relatives or close friends currently employed, or
6 have been previously employed, by any of the following businesses: Broadway Grill in
7 Seattle, WA; Grand Central Baking Company in Seattle, WA; Mad Pizza in Seattle and
8 Tukwila, WA; Village Pizza in Anacortes, WA; Casa Mia Italian Pizzeria in Yelm, WA;
9 Red Pepper Pizza in Duvall, WA; Schlotzky's Deli in Coeur d'Alene, ID; City News
10 Stand locations in Illinois; or Z Pizza locations in California, Montana and Virginia?

11 41. Do any of you read ,speak, or understand the Russian language?

12 42. As a juror, your obligation would be to apply the facts according to the law
13 as given to you by the court. You must follow the court's instructions on the law, even if
14 you disagree with those instructions. Is there anyone who would be unable or unwilling
15 to follow the court's instructions if you thought the law was wrong or unfair?

16 43. Do any of you have any moral, religious, or philosophical beliefs that
17 would prevent you from sitting in judgment of, and returning a verdict against, another
18 person?

19 44. Do you have any deadlines or emergencies at work that need your
20 immediate attention and would cause you to not be able to concentrate on the proceedings
21 in court?

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1 45. Can any of you think of any reason that would prevent you from being able
2 to render a fair and impartial verdict based solely on the evidence and the law as the
3 Court will instruct you at the conclusion of this case?

4 DATED this 25th day of July, 2016.

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6 Respectfully submitted,

7 ANNETTE L. HAYES
8 United States Attorney

LESLIE R. CALDWELL
Assistant Attorney General

9 s/ Norman M. Barbosa

10 NORMAN M. BARBOSA
11 Assistant United States Attorney

s/ Harold Chun

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the defendant.

s/Janet K. Vos

JANET K. VOS

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